

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

Louis Agre, William Ewing,	)	
Floyd Montgomery, Joy Montgomery,	)	
and Rayman Solomon,	)	
	)	
	)	
Plaintiffs,	)	
	)	Civil Action No. 17-4392
v.	)	
	)	
Thomas W. Wolf, Governor of Pennsylvania,	)	
Pedro Cortes, Secretary of State of	)	
Pennsylvania, and Jonathan Marks,	)	
Commissioner of the Bureau of Elections,	)	
in their official capacities,	)	
	)	
Defendants.	)	
	)	
and	)	
	)	
Michael Turzai, Speaker of the Pennsylvania	)	
House, and Joseph Scarnati, President	)	
Pro Tem of the Pennsylvania Senate, in their	)	
Official capacities	)	
Defendant-Intervenors		

**MOTION FOR SANCTIONS PURSUANT TO FED. R. CIV. P. 37(b)(2)**

Pursuant to Rule 37(b)(2) of the Federal Rules of Civil Procedure, Plaintiffs hereby request that the Court grant their motion for sanctions against Legislative Defendant Michael C. Turzai, in his official capacity as Speaker of the Pennsylvania House of Representatives (Speaker Turzai) and Joseph Scarnati, President Pro Tem of the Pennsylvania Senate, in his official capacity (Sen. Scarnati)(collectively, “Legislative Defendants”) for failure to comply with the Orders of this Court of November 22, 2017

(ECF Doc 114) and November 28, 2017 ECF Doc.144), as set forth in the accompanying Brief and proposed Form of Order.

Respectfully submitted,

**HARDWICK BENFER, LLC**

BY: /s/Virginia L. Hardwick

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Dated: December 3, 2017